

AFFIDAVIT OF SPECIAL AGENT MATTHEW C. KNIGHT

I, Matthew C. Knight, being duly sworn, depose and state as follows:

I. INTRODUCTION

1. I am a Special Agent of the Federal Bureau of Investigation ("FBI"). I am submitting this affidavit in support of the government's motion that the following individuals be detained pending trial: DAVID JONES, A/K/A "SUPA"; KAREEM BERRY, A/K/A "TY", A/K/A "J"; AARON BLOUDSON, A/K/A "BONES"; JORGE CEPEDA, A/K/A "JUNITO"; DEARON CURETON, A/K/A "TABBY"; ESTEVE DIAZ, A/K/A "STEVIE-O"; FRANKIE FINKLEA; RASHEED MARSMAN; RAHZHAN SPRIGGS, A/K/A "RAY"; ILEANA VALDEZ, A/K/A "LORI", A/K/A "LORENA"; ELVIS PENA, A/K/A "JIMMY"; JOSEPH BENSON; CARLTON BUFORD; ISRAEL DELACRUZ; JAMES HARDY; RICHARD MAHONEY; ISMAEL VASQUEZ; DEMETRIUS WILLIAMS, A/K/A "TROLL"; YANCEY WILLIAMS, A/K/A "YUNG"; TEVIN ABERCROMBIE; ROBERTRO ANDRADE; YANCEY CALHOUN, A/K/A "POPS"; ANTHONY COPLIN; BENJAMIN FIGUEROA; DERONN FUNCHES, A/K/A "SLIM DEALZ"; MICHAEL GAINES, A/K/A "HOLIDAY"; SHAROD HOPKINS; LORENZO MYERS, A/K/A "ZO"; LOUIS WHITEHEAD, A/K/A "L", A/K/A "LITTLE MAN"; ARTHUR WILLIAMS, A/K/A "G", A/K/A "G-CODE", A/K/A "G-SOURCE"; BRANDI WILLIAMS, A/K/A "BREEZY"; SEKOU WILLIAMS, A/K/A "SHOES"; WILLIE BERRY, A/K/A "SCO", A/K/A "SCODOUGH"; TONY BERRY, A/K/A "MAZIBRAWL"; FRANCISCO ARIAS, A/K/A "EMILIO PEREZ"; ANTONIO CHATMAN; DAVID

COKE, A/K/A "SLIME"; ROSHAUN HAWKINS, A/K/A "PRETTY"; JUAN LARA, A/K/A "MIGUEL"; DESMOND PERSON; JAMES WILLIAMS; MICHAEL COKE, A/K/A "DIRTY MIKE"; LARRY BAILEY; ANTHONY CALDWELL, A/K/A "AC"; MEMOGNE LAMOTHE, A/K/A "MAEMO", A/K/A "MIZZ"; and MIKE MCNEILL, A/K/A "MURDER MIKE", A/K/A "M-3" (hereinafter collectively referred to as "the Targets"). All of the Targets have been charged with various drug and/or firearm violations in five separate federal indictments issued on June 16, 2015. All of the Targets are also alleged to be leaders, members, or significant criminal associates of the Columbia Point Dawgs, a/k/a "the Point," and are alleged to be involved in a host of criminal activities in, among other places, Boston, Massachusetts, Maine, New York, and Georgia.

2. I have been a Special Agent with the FBI since 2004 and am currently assigned to the FBI's Boston Field Office. Since 2004, I have been involved in dozens of investigations relating to a wide variety of suspected criminal activity, including, among other things, drug and firearm trafficking by organized street gangs. I was previously employed as a police officer with the Baltimore Police Department from 1997 to 2004, and was assigned as a Detective investigating drug trafficking crimes from 2001 to 2004. I have been the affiant on numerous affidavits in support of criminal complaints, search warrants, and Title III wiretaps.

3. In the course of participating in investigations of drug trafficking, I have conducted or participated in surveillance, the purchase of illegal drugs, the execution of search warrants, debriefings of subjects, witnesses, and informants, and reviews of consensually recorded conversations and meetings. I have also received training in narcotics trafficking through my position as a FBI Special Agent. Through my training, education, and experience, I have become familiar with the manner in which drug traffickers conduct their illegal drug trafficking activity, to include their use of cellular telephones to contact drug customers, drug runners, drug associates, and sources of illegal drug supply. I am familiar with narcotics traffickers' methods of operation, including distribution, storage, and transportation of narcotics. The information contained in this affidavit is based on my own investigation, oral and written reports by other law enforcement officers, physical surveillance, information from confidential informants/cooperating witnesses, public records, database checks, and other investigations. My interpretation of phone calls intercepted pursuant to court orders is based upon the above information as well as my training and experience. I have not included each and every fact developed in this investigation in this

affidavit. Rather, this affidavit includes facts I believe to be relevant to issues under 18 U.S.C. § 3142 with respect to the Targets.

II. COLUMBIA POINT

A. THE PROMISE OF A BRIGHT FUTURE

4. The Dorchester Bay peninsula, later known as Columbia Point, was once home to a United States Army barracks called Camp McKay. This one-story, wooden barracks, built in 1942, used to house Italian prisoners of war during World War II. Much of the land was used as a pasture for animals, two large dumps, and a sewage pumping station, as well as being home to a few industrial companies.

5. Following World War II, there was a high demand for low-cost housing in Boston. In 1946, the prisoners of war were moved out of the Dorchester Bay peninsula, temporary public housing tenants were moved in, and Camp McKay became known as the Columbia Village housing projects. The Boston Housing Authority ("BHA") saw an opportunity in this relatively neglected section of Dorchester and devised an ambitious plan for this barren stretch of land.¹

6. In 1951, the BHA broke ground in the Dorchester Bay peninsula, now also home to Boston College High School, on the

¹ See generally *A Decent Place to Live, from Columbia Point to Harbor Point*, Jane Roessner, at 5-9 (2000).

largest housing project ever built in New England at the time. Three years later, in April of 1954, Boston Mayor John B. Hynes announced the opening of public housing project Columbia Point, containing thirty, seven-story structures and 1,504 units, which would hold approximately 6,000 tenants. During the ceremony, Mayor Hynes announced that a major shopping center, chapel, school, playgrounds, and beach would be constructed in or near the project to make it "the most self-sufficient section of the city".²

7. The early years of Columbia Point were an apparent success. It was quickly filled with working-class families with limited income, excited about living in a new community that was promised to be a "safe and sanitary" place to raise their family. A former Columbia Point resident recalls: "[I]t was a place of real community spirit. Families were real close to each other . . . you never even locked your doors."³

B. RAVAGED BY GANG VIOLENCE AND CRIME

8. By the mid-1960s, Columbia Point was on the road to deterioration. By the 1970s, news stories about Columbia Point almost exclusively dealt with crime and gang violence. By that time, Columbia Point had become so severely plagued by crime

² Id. at 21.

³ Id. at 18, 47.

that the Boston Fire Commissioner asked for police protection for all fire engines responding to Columbia Point.⁴

9. By the early 1980s, 80% of the units in Columbia Point were vacant, and the project was largely under the control of gangs and other criminal elements. Many residents fled Columbia Point to protect their children. Columbia Point was largely regarded as one of the most dangerous and unsanitary public housing projects in the city, with only 350 units legally occupied during this time and many of the vacant units occupied by squatters, drug dealers, and prostitutes.⁵ As one tenant reported, "no one wanted to come out here . . . the gangs were infesting our housing."⁶

III. THE COLUMBIA POINT DAWGS

A. THE 1980s: BORN BY BLOOD

10. In the early 1980s, members of a street gang from Detroit, Michigan, moved in and set up a drug trafficking organization inside the Columbia Point housing complex. They were called the "Bomb Boys," also referred to as the "Detroit

⁴ See generally *Privately-Funded Public Housing Redevelopment: A Study of the Transformation of Columbia Point*, Institute for International Urban Development, Cambridge, MA (2008).

⁵ Id.

⁶ *Boston War Zone Becomes Public Housing Dream*, The New York Times (November 22, 1991).

Boys." Once the Bomb Boys established themselves in the projects, they employed many of the residents to assist them in their drug distribution network which expanded into the Roxbury/South End neighborhood in Boston.

11. Columbia Point residents working with the Bomb Boys eventually rebelled against the outsider-leadership from Detroit. In 1988, the leader of the Bomb Boys, Toby Johnson, a/k/a "Blood", was stabbed to death after leaving a nightclub in Roxbury. George and John Chatman, two brothers from Columbia Point who had worked for the Bomb Boys' drug trafficking business, subsequently pled guilty to the Johnson murder and were sentenced to 12-15 years' imprisonment. The Johnson murder marked the end of the Bomb Boys reign in Columbia Point. By 1989, the Boston Police began receiving information that Columbia Point was being run by the "Columbia Point Dawgs," a gang made up almost entirely of Columbia Point residents.

12. While the Columbia Point Dawgs were taking over the Bomb Boys' drug business, Columbia Point was falling further and further into disrepair. The City of Boston turned over management of the development to a private management company which began a lengthy renovation project that would ultimately become the Harbor Point development. To facilitate the renovation, the management of the development instituted a series of evictions and trespassing notices against members of

the Columbia Point Dawgs, essentially banning them from the development. In response, members of the CPD began relocating their drug trafficking activity to other neighborhoods in Boston, in particular the Lenox Street projects and the area of Morton Street and Clarkwood Street in Mattapan.

B. THE 1990s: SECURING RIVAL GANG, DRUG TURF

13. During the 1990s, the Columbia Point Dawgs, a/k/a "the Point" (also referred to herein as the "CPD"), developed its command structure, formulated largely through separate drug trafficking crews, and began consolidating its power and influence as a city-wide gang. Columbia Point/Harbor Point was no longer a hospitable drug trafficking base. Employing a bold and dangerous strategy, the CPD began infiltrating drug trafficking locales controlled by rival gangs. The result was predictable. Gang warfare erupted throughout Boston, shootings were prevalent, and many Boston gang members and innocent bystanders were killed.

14. In the early 1990s, the CPD was largely run by four families, all of which have descendants among the Targets in this case: the **Williams** family, the **Woods** family, the **Berry** family, and the **Funches** family. Members of the CPD, then and now, often identified themselves by wearing Major League Baseball clothing and caps depicting the colors and logos of the Pittsburgh Pirates (Black and Gold) and the Philadelphia

Phillies (Red and White), with the "P" on both logos used to identify the "Point" (i.e., Columbia Point).

15. While many members of the CPD returned to the newly minted Harbor Point development in the early 1990s, others settled in other areas of the City. In the early 1990s, the CPD identified Ramsey Park in Roxbury as prime drug trafficking turf, and began moving operations to that location. Ramsey Park abutted the Lenox Street housing development, however, and drug trafficking operations in the park were run by the Lenox Street gang. During this period, the CPD and Lenox Street engaged in a series of shootings and homicides over drug distribution in the park. The CPD prevailed and took over control of drug trafficking in Ramsey Park.

16. The pattern of the CPD muscling its way into drug territories held by rival gangs continued throughout the 1990s. The CPD established its authority over drug turf throughout various neighborhoods of Boston through a pattern of violent shootouts with members of rival gangs, particularly with the KOZ gang and the Orchard Park gang, often at barrooms and late night eateries where the gangs would clash. For example, on November 7, 1993, members of the CPD and members of the KOZ gang engaged in a shootout at a late night restaurant on Blue Hill Ave in Mattapan. Responding Boston Police Officers also exchanged gunfire with the two gangs. The police on scene reported

gunfire from at least seven sources. At least four gang members were wounded and numerous firearms were recovered.

17. The CPD's infiltration of drug trafficking territories previously held by rival gangs led to increased gang tensions and resulted in numerous shootings and homicides. This period included several high-profile, gang-related homicides, including that of Atwan Parham, a prominent member of the Orchard Park street gang, and that of Steven Sealey, a member of the Columbia Point Dawgs who was shot and killed while sitting in Whitney Houston's Bentley with the singer Bobby Brown. John Tibbs, a/k/a "Black", an Orchard Park gang member, was convicted for the murder of Steven Sealey. The CPD emerged from the bloodshed of the 1990s as one of the two most feared gangs in Boston, along with the Academy Homes Braves in Roxbury.

C. THE 2000s: CONSOLIDATING POWER AND INFLUENCE

18. During the 2000s, through violence and intimidation, the Columbia Point Dawgs solidified their hold over rival drug trafficking territories throughout Boston and developed into a truly city-wide gang. CPD members were now spread throughout the city, controlling various drug trafficking turfs. Regardless of where they were located, however, they "repped" the Point -- i.e., they remained overt members of the CPD and used their gang affiliation, threat of violence, and influence to gain and maintain drug trafficking turf. Unlike the majority

of Boston street gangs, which were, and remain, primarily geographically limited in influence to a street, neighborhood, or housing project, the CPD have tentacles and influence throughout the city.⁷

19. Expulsion from Harbor Point caused the CPD to move into other Boston neighborhoods to run their drug businesses. CPD members took to the streets announcing their presence through violence and drug dealing. CPD-led robberies of local business owners and neighborhood residents in the after school hours increased, as did those reporting the use of weapons such as firearms and knives. Older CPD members with established reputations for violence began committing armed home invasions of local drug dealers, stealing product, firearms, and money. In short, CPD used violence and generally intimidated their neighborhoods to dominate the neighborhoods into which they expanded.

20. During the 2000s, WILLIE BERRY, A/K/A "SCO"; TONY BERRY, A/K/A "MAZIBRAWL"; DEMETRIUS WILLIAMS, A/K/A "TROLL"; YANCY WILLIAMS, A/K/A "YUNG"; ANTHONY COPLIN; and LOUIS WHITEHEAD, A/K/A "L", A/K/A "LITTLE MAN", grew to prominence as leaders of the CPD. During this period, the CPD and the Academy Homes Braves, based in the Academy Homes housing project in

⁷ The rise to prominence of the CPD was in part impacted by the 1995 federal Indictment and arrests of over 20 members of the Head Quarter Boys, at the time the largest and most influential Boston street gang.

Roxbury, were the two most feared and influential drug trafficking gangs in Boston. LOUIS WHITEHEAD and his family lived in Academy Homes, and eventually facilitated an alliance between the CPD and Academy Homes to further their respective, lucrative drug and firearm trafficking businesses.⁸

21. The CPD continued expanding its drug trafficking business through southern Massachusetts, establishing strongholds in Brockton and Fall River, Southern New Hampshire, and Southern Maine. As the success of the CPD's drug trafficking grew, so did the wealth of CPD members, who increased the notoriety of the gang through the creation of various record labels under the names "8 Bus Records," named for the MBTA Bus Route that went to Harbor Point, and the "Waterboyz", reflecting the topography of the Dorchester peninsula containing Harbor Point.

22. CPD gang members used the record labels to promote rap shows, occasionally demanding that visiting artists pay "protection fees," or a tax, to perform in Boston, and produced videos in which CPD showcased its luxury vehicles, expensive jewelry, and firearms. By 2010, the CPD was known up and down the East Coast as a street gang that was here to stay.

⁸ In 2011, Owens Brown, the long-time leader of the Academy Homes Braves, along with 11 other Academy Homes gang members and associates, were charged federally in Boston with various drug trafficking crimes. Brown pled guilty and in 2012 was sentenced to 15 years' imprisonment.

D. THE 2010s: THE MOST POWERFUL GANG IN BOSTON

23. The 2010s marked the CPD's solidification as the most feared, influential, and largest street gang in Boston. The gang was divided into trafficking crews throughout different areas of the city. CPD gang members were frequently seen in the city driving expensive luxury cars, such as Maseratis and Lamborghinis. For example, during the investigation, TONY BERRY, YANCEY WILLIAMS, DAVID COKE, and ARTHUR WILLIAMS were all seen driving different Maseratis, as well as wearing expensive jewelry and designer clothing, and spending freely in the clubs. Other CPD members were observed operating Mercedes-Benz, Infiniti, and Audi motor vehicles. As the top city gang, making the most money, the CPD became a target/subject for rival gangs. In particular, during this period, the CPD engaged in violent shooting "beefs" with the Orchard Park Trailblazers and the Greenwood Street Posse, a/k/a "the Packers."

i. Continued expansion of drug networks

24. As the prominence and influence of the CPD grew, its leadership split the running of the day-to-day drug dealing operations between the BERRY family, headed by brothers TONY and WILLIE BERRY, and the WILLIAMS family, headed by brothers DEMETRIUS and YANCEY WILLIAMS. The CPD membership consolidated their drug trafficking activities into separate street crews ("Crews") operating numerous drug stash houses throughout

Boston. Evidence derived from controlled buys, Court-authorized wiretaps, and attendant surveillance, as well as seizures shows that the CPD Crews distributed multi-kilogram quantities of heroin, cocaine, and crack, as well as thousands of oxycodone pills throughout the course of the investigation.

25. During the course of the investigation, **TONY BERRY** would frequently travel from Atlanta, GA, to Boston, MA, and then go to New York, NY, to pick up a load of oxycodone pills, which he would bring back to Boston for distribution by, among others, CPD member **ROSHAUN HAWKINS**. On May 13, 2015, investigators seized 1,688 oxycodone pills from **TONY BERRY** on his way back to Boston from New York.⁹ **TONY BERRY** owns property in Atlanta, GA. **TONY BERRY** has bought several high caliber weapons in Georgia, and has posted photographs of himself holding and displaying the weapons on social media and using his street name "mazibrawl". See photographs attached hereto as Exhibit 1.

26. **TONY** and **WILLIE BERRY's CREW** used the **BERRY** family home at 76 Radcliffe Street in Dorchester as their hub of drug operations, as well as 8 Bus Records. **WILLIE BERRY** used the third-floor apartment of the family home to package, store and distribute heroin, oxycodone, and crack, and used CPD members

⁹ **TONY BERRY** was charged in state court with trafficking oxycodone. He posted a \$50,000 cash bail a few days later and returned to Atlanta, GA, in violation of his conditions of release that he not leave Massachusetts.

ROSHAUN HAWKINS and ANTONIO CHATMAN to distribute oxycodone and heroin. JUAN LARA, FRANCISCO ARIAS, and DAVID COKE supplied WILLIE BERRY with oxycodone and heroin. DESMOND PERSON and JAMES WILLIAMS, long time CPD associates, used WILLIE BERRY as a source of supply for heroin, crack, and cocaine.

27. In addition to supplying WILLIE BERRY with cocaine and heroin, DAVID COKE and MICHAEL COKE, long-time associates of CPD and the Berry family, ran a violent robbery and drug trafficking Crew operating out of DAVID COKE's auto-body shop in Stoughton and MICHAEL COKE's storage facility in Randolph. The COKE CREW was supplied with heroin and cocaine by the long-time drug trafficker FRANCISCO ARIAS, and also obtained kilograms of cocaine from LARRY BAILEY, who used his two Boston businesses -- Finest Cuts barbershop, located at 405 Blue Hill Avenue, and Bailey's Laundromat, located at 1135 Harrison Avenue -- to sell cocaine and cocaine base to customers on the streets of Boston. DAVID COKE's customers included Corbett Street gang member MICHAEL MCNEILL, Greenwood Street gang member MEMOGNE LAMOTHE, and Lynn-based drug dealer ANTHONY CALDWELL.

28. DEMETRIUS and YANCEY WILLIAMS' Crew operated a lucrative drug trafficking business throughout Boston, and ran a drug pipeline between Boston and Portland, Maine. The WILLIAMS CREW used drug stash houses, or "Traps," at three Boston locations: 6 Metcalf Court; 26C Saint Alphonsus Street; and 4

Wakullah Street. These Traps were overseen by family members, such as BRANDI WILLIAMS, CPD members, and members of the closely aligned St. Josephs Street Gang, such as Shawn Myers and LORENZO MYERS.

29. YANCEY CALHOUN, the father of DEMETRIUS and YANCEY WILLIAMS, and a longtime CPD member, oversaw the Portland, Maine, branch of the WILLIAMS CREW'S drug operation. The WILLIAMS CREW was supplied with cocaine by CPD member ANTHONY COPLIN, who used his business, Atlantic Fashion and Communications, located at 541 Dudley Street in Boston, to distribute kilogram quantities of cocaine. The WILLIAMS CREW was also supplied with cocaine by CPD member LOUIS WHITEHEAD, who expanded the CPD's drug trafficking business into Fall River, MA, as well as by CPD members, and cousins, ARTHUR WILLIAMS and SEKOU WILLIAMS.

30. On May 16, 2015, LOUIS WHITEHEAD and co-defendants YANCEY WILLIAMS and ARTHUR WILLIAMS, were arrested in Mansfield, MA, after repeatedly shooting at two passengers in a car while driving down Route 138. A firearm was recovered from the car and all three men were charged with two counts of assault with intent to murder. A subsequent search of LOUIS WHITEHEAD's cell phone uncovered several photographs related to his CPD membership, including the photographs of WHITEHEAD attached as

Exhibit 2 and photographs of a social media posting attached as Exhibit 3.

31. To strengthen the hold of CPD in the city, **DEMETRIUS** and **YANCEY WILLIAMS** formed drug trafficking alliances with other gangs. For example, the **WILLIAMS CREW** supplied drugs not only to CPD members such as **DERONN FUNCHES** and **SHAROD HOPKINS**, but also to H-Block member **MICHAEL GAINES**, Mission Hill gang member **TEVIN ABERCROMBIE**, Wilmington Street gang member **ROBERTO ANDRADE** (who operated in Brockton), and Latin King gang member **BENJAMIN FIGUEROA** (who operated in Framingham).

32. **DAVID JONES** oversaw the day-to-day operation of his own street crew, a subset of the **WILLIAMS CREW**, operating out of two stash houses located at 4 Beale Street, and 153 Norwell Street, in Dorchester. During the investigation, CPD members **FRANKIE FINKELA**, **JORGE CEPEDA**, **KAREEM BERRY**, and **RAHZHAN SPRIGGS** used the stash houses, or "Traps", as round-the-clock drug delivery locations. Older CPD members **ESTEVE DIAZ**, **AARON BLOUDSON**, and **DEARRON CURETON** were alternative sources of cocaine and crack for the **JONES CREW** when CPD leader **DEMETRIUS WILLIAMS** was unavailable. **RASHEED MARSMAN**, a longtime Boston drug dealer, would also act as a source of cocaine supply to **DAVID JONES** and members of the **JONES CREW**.

33. In addition to utilizing the **COKE CREW**, CPD members had a pipeline to **ILEANA VALDEZ**, head of a large heroin and

cocaine trafficking ring. **IELANA VALDEZ** used trusted drug runners such as **ELVIS PENA** to run a round-the-clock drug delivery organization. Investigators identified three drug stash houses and one money stash house used by **ILEANA VALDEZ** and **ELVIS PENA** during the investigation, including 535 Washington Street, Canton, MA. On September 27, 2014, agents photographed **VALDEZ** leaving 535 Washington Street with several containers that she placed in the trash. A subsequent trash pull revealed that the containers held kilogram wrappers that were still wet from being rinsed out.

34. In addition to supplying CPD members **KAREEM BERRY**, **JOSEPH BENSON**, and **JAMES HARDY** with hundreds of grams of heroin a week, **ILEANA VALDEZ** and **ELVIS PENA** supplied numerous heroin and cocaine dealers working in Boston such as **CARLTON BUFORD**, **ISMAEL VASQUEZ**, and **ISRAEL DELACRUZ**, and on the South Shore such as **RICHARD MAHONEY**.

ii. Gang beef with Orchard Park Trailblazers

35. The Columbia Point Dawgs have a long-standing beef with the Orchard Park Trailblazers. This beef boiled over in 2011 when 8 Bus produced a rap video featuring **TONY BERRY** and a CPD associate (hereinafter "Kidnapping Victim 1"), wearing a Waterboyz t-shirt, that was filmed on the corner of Warren and Zeigler Streets in Roxbury, a short distance from the Orchard Park Housing Development -- home to the Orchard Park

Trailblazers. According to law enforcement sources, the video was viewed as demonstrating the CPD's flagrant disrespect for the Trailblazers and their territory.

36. On June 6, 2011, according to law enforcement sources and Boston Police reports, Kidnapping Victim (a member of CPD) was kidnapped and a \$100,000 ransom demand was made of his brother **WILLIE BERRY**. On June 7, 2011, at approximately 7 a.m., an Orchard Park gang leader (hereinafter referred to as "OP Victim 1") (and two innocent bystanders), were shot in an apparent drive by shooting outside an auto body shop in Dorchester. Toll records show numerous contacts between a cellular telephone used by OP Victim 1 and various members of Kidnapping Victim 1's family on the night of the kidnapping.

37. Kidnapping Victim 1 was located by police later that day in Chelsea. He had escaped a nearby basement apartment, appeared dazed, and had ligature marks on his wrists. In the ensuing month, a second Orchard Park gang leader (hereinafter "OP Victim 2"), was found shot in his car. Kidnapping Victim 1 later released a video referring to being held in a basement and to the shooting of OP Victim 2.¹⁰

38. Members of the CPD, such as **TONY BERRY**, Kidnapping Victim 1, and **ANTONIO CHATMAN**, have also used 8 Bus

¹⁰ I know the identities of Kidnapping Victim 1, OP Victim 1, and OP Victim 2, and have intentionally excluded them from this affidavit.

Records/Water Boyz Records to produce music videos offering to sell Suffolk County Grand Jury minutes exposing the identities of homicide witnesses who are rival gang members of the Point. For example, an October 2014 video posted on YouTube shows several members of the CPD, including, *inter alia*, **TONY BERRY**, Kidnapping Victim 1, and **ANTONIO CHATMAN**, holding Boston Police Homicide Unit Reports and Suffolk County Grand Jury minutes identifying four Orchard Park gang members as cooperating witnesses in a homicide case. The reports identify the witnesses by name, date of birth, address, and telephone number. **TONY BERRY** and Kidnapping Victim 1 are depicted on the video offering to sell the information for \$19.95, and attempting to incite retaliation by other street gangs against Orchard Park gang members.¹¹

iii. Gang beef with Greenwood Street Posse

39. The Greenwood Street Posse, a/k/a the "Packers",¹² is a long-standing, significant Dorchester street gang closely affiliated with the Franklin Hill Giants. Greenwood is also

¹¹ Kidnapping Victim 1, a prominent member of the CPD, was a target of this investigation. Kidnapping Victim 1 was in custody for most of the investigation, however, so evidence was not developed against him. In 2014, shortly after the investigation began, however, Kidnapping Victim 1 was arrested in connection with a drive-by shooting at a night club in New York City. He was detained in New York pending trial and ultimately pled guilty to two counts of assault with intent to murder. Kidnapping Victim 1 is presently serving a five year sentence.

¹² Greenwood Street wears the colors and/or NFL paraphernalia of the Green Bay Packers.

loosely aligned with the Norfolk Street Bulls and the Orchard Park Trailblazers. Greenwood Street and the Point have been engaged in a violent, shooting beef since approximately June 24, 2014 when, according to law enforcement sources, several CPD members shot at a Norfolk Street Bulls' gang member who was hanging out on CPD turf located at Carson Beach in South Boston -- over a dispute related to the rap business -- and accidentally shot a member of the Greenwood Street Posse.

40. Since June 2014, there has been a shooting war going back and forth between the Point and Greenwood Street. These shootings were referred to in conversation intercepted over the wiretaps. On several occasions during the course of the investigation, investigators conducted "wall-off" stops and/or firearm seizures based on information obtained through wiretaps that a CPD member was looking to shoot a Greenwood Street member.

41. The end of July 2014 was a particularly active time in the CPD/Greenwood Street beef, involving numerous non-fatal shootings. On July 26, 2014, a member of CPD was shot in the face. On July 28, 2014, a member of CPD was shot near his home in Weymouth. On July 30, 2014, a member of CPD was shot in South Boston. On July 31, 2014, two Greenwood Street gang members, and a close associate, were all shot on Gleason Street

in Dorchester. On August 1, 2014, a Franklin Hill gang member was shot in Dorchester.¹³

42. On August 17, 2014, according to law enforcement sources and police reports, members of the Columbia Point Dawgs engaged in a shootout with gang members from the Greenwood Street Posse, Norfolk Street Bulls, and the Franklin Hills Giants on Edinboro Street in Boston's Chinatown. At the scene, investigators seized two guns and the wallet of **YANCEY WILLIAMS** from a car associated with **YANCEY WILLIAMS**.¹⁴

43. On December 26, 2014, **DEMETRIUS WILLIAMS** was shot in his white Mercedes Benz while leaving 6 Metcalf Court in Dorchester to pick up a CPD member so that they could cook a quantity of cocaine into crack. As he was leaving 6 Metcalf, as captured by a wiretap, **WILLIAMS** said: "I'm gonna come get you, umm we gonna ummm, go to Skeets' and go to my crib start handling that shit." Moments after **WILLIAMS** hung up, a car pulled up next to him and fired thirteen rounds into his car.

44. Shortly thereafter, as captured on a wiretap, **DEMETRIUS WILLIAMS** contacted **YANCEY WILLIAMS** and other CPD members to tell his side of the story about the shooting, and to

¹³ I know the names of the victims of all of these shootings and have intentionally excluded them from this affidavit.

¹⁴ I know the names of many of the other individuals involved in the Chinatown shooting and have intentionally excluded them from this affidavit.

advise them that he believes that someone "got the drop" on his location and was waiting on him. **YANCEY WILLIAMS** indicated that the shooters were driving around with two guns and agreed that the shooting was a well-planned assassination attempt. Another CPD member, who was conferenced in, agreed that people don't ride around "two deep" with firearms unless they already have the "drop" (i.e., location of target).

45. **YANCEY WILLIAMS** also noted, "that bitch nigga called his sister who was having something and sent niggas over there, nigga said he was on her snap." **DEMETRIUS WILLIAMS** confirmed that he knew the person to whom **YANCEY WILLIAMS** was referring. **YANCEY WILLIAMS** also said "G" (presumably **ARTHUR WILLIAMS, A/K/A "G"**) told him to "fall back" but that he would not "fall back" (i.e., he was going to go after whoever shot at **DEMETRIUS WILLIAMS**). In the ensuing days, **DEMETRIUS WILLIAMS, DAVID JONES** and other members of CPD attempted to learn the identity of the shooters, and **DEMETRIUS WILLIAMS** noted, as captured on a wiretap, that it was "definitely them niggas" (i.e., members of Greenwood Street).¹⁵

46. Shortly after this shooting, the wiretap on **DEMETRIUS WILLIAMS'** phone produced several calls indicating that **DEMETRIUS WILLIAMS** was trying to get a gun, which was referred to in the

¹⁵ Based on these calls, investigators notified several Greenwood Street members and associates that they may be targeted for retaliation.

calls as "hoodies" or "sweaters." For example, **DEMETRIUS WILLIAMS** called **SHAROD HOPKINS** and asked if **HOPKINS** had a "sweater". **SHAROD HOPKINS** stated that he was at work but that **DEMETRIUS WILLIAMS** could go to **SHAROD HOPKINS'** house and get **SHAROD HOPKINS'** "sweater." **DEMETRIUS WILLIAMS** stated that he could probably get one of his own, "Yeah, I'll get one, I'll get one, I'll one not today, I'll get one of my shit or sumthin."

47. On March 27, 2015, a Greenwood Street gang member was shot at 2 p.m. in the afternoon while driving a BMW on Columbus Avenue in Boston. An individual believed to be a CPD gang member (whose identity I know) was chased in his car by law enforcement after the shooting and threw a Glock .40 firearm out the window.¹⁶ Investigators subsequently intercepted **DAVID COKE** over a wiretap telling an unknown male the identity of the CPD shooter and confirming that the CPD member was driving a Toyota Tundra that day (which was accurate). **DAVID COKE** also told the unknown male that the CPD member told **DAVID COKE** that he was looking to flee Massachusetts until things calmed down. **DAVID COKE** and the unknown male then joked about coaching gang members about how to shoot each other.

¹⁶ The ATF has determined that the Glock was purchased in New Hampshire by a CPD gang member, whose name I know.

48. On October 12, 2014, **DAVID JONES** and an unknown male were intercepted on a wiretap discussing a gang fight at Saks Fifth Avenue fight (captured on store surveillance cameras) where Kidnapping Victim 1 (a member of CPD) led a group of CPD members into the store to attack a Greenwood Street member.

49. On December 11, 2014, investigators intercepted a conversation between **DEMETRIUS WILLIAMS** and an unknown male in which the latter said that an associate would be in Boston that afternoon looking to sell a Ruger pistol for around \$600. Later that day, as intercepted on a wiretap, a man (hereinafter the "Gun Seller") contacted **DEMETRIUS WILLIAMS** explaining that he was the guy with the gun for sale, referring to it as a "Ruger joint P95 shit, she, she pretty too," and saying that he would sell it to **DEMETRIUS WILLIAMS** for \$675 at South Station in Boston. The Gun Seller also indicated that he would shoot Greenwood Street gang members if **DEMETRIUS WILLIAMS** wanted him to. Investigators subsequently seized a Ruger P95, semi-automatic pistol, loaded with 15 rounds of ammunition, from the Gun Seller's backpack at South Station in Boston.

V. THE ARRESTS AND SEIZURES

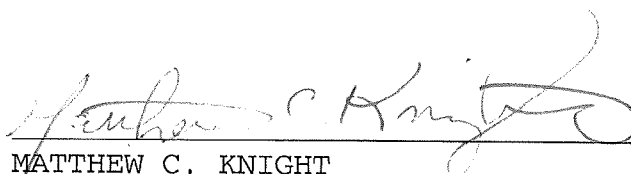
50. During the investigation, agents seized 14 firearms, 11 vehicles, approximately \$100,000 in cash, and quantities of cocaine, heroin, crack, and oxycodone pills. Most of the Targets were arrested in the early morning hours of June 18, 2015, and the investigative team executed approximately 27 federal search warrants. Among other things, the following items were seized in connection with the arrests and search warrants (the execution of the search warrants remains ongoing and these amounts are subject to change):

- 17 guns (bringing the total number of guns seized in the investigation to date to 31);
- multiple boxes of ammunition;
- approximately a kilogram of heroin;
- over 200 grams of cocaine and over 100 grams of crack;
- approximately \$1.5M in cash; and
- 4 vehicles.

VII. CONCLUSION

The Columbia Point Dawgs is a violent street gang with a significant operating objective - the protection of drug trafficking and other illegal activities by its members through violence and intimidation. Each of the Targets in this case is a member of the gang (and in many instances, a member of its leadership) or a significant associate (for example, a drug or firearm supplier to gang members). All of the Targets have demonstrated that they are drug and/or firearm traffickers and either dedicated members of the Columbia Point Dawgs who contribute to its operation and violence, or significant criminal associates who share the basic objectives of the gang. Each should therefore be detained pending trial.

Signed under the pain and penalties of perjury this 18th day of June 2015.

A handwritten signature in dark ink, appearing to read "Matthew C. Knight", is written over a horizontal line.

MATTHEW C. KNIGHT
SPECIAL AGENT
FEDERAL BUREAU OF INVESTIGATION